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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

MON CHERI BRIDALS, LLC, and MAGGIE
SOTTERO DESIGNS, LLC,

Plaintiffs,

v.

CLOUDFLARE, INC., a Delaware corporation; and
DOES 1 - 10, Inclusive,

Defendants.

Civil Action No.
3:21-cv-08459-MAS-DEA

**DECLARATION OF SAPNA MEHTA
IN SUPPORT OF DEFENDANT
CLOUDFLARE, INC.'S MOTION TO
SEAL**

I, Sapna Mehta, hereby declare pursuant to 28 U.S.C. § 1746 as follows:

1. I am an associate at Fenwick & West LLP, counsel for Defendant Cloudflare, Inc. (“Cloudflare”) in Case No. 3:19-cv-01356-VC pending in the United States District Court for the Northern District of California. I am a member of the bars of the State of California and of the District of Columbia. I submit this declaration in support of Cloudflare’s Motion to Seal. I have personal knowledge of the statements in this declaration.

2. In support of its Opposition to American Bridal and Prom Industry Association, Inc.’s Motion to Quash Subpoenas, Cloudflare submitted as an exhibit a document that Plaintiffs produced in the underlying case at MCMS 06875. That document is Exhibit 6 to the Declaration

of Sapna Mehta in Support of Opposition to American Bridal and Prom Industry Association, Inc.'s Motion to Quash Subpoenas. Plaintiffs designated that document as "CONFIDENTIAL" under the Protective Order entered by the Court in the underlying case at *Mon Cheri Bridals, LLC v. Cloudflare, Inc.*, Case No. 3:19-cv-01356-VC (N.D. Cal. Apr. 17, 2020), Dkt. 77. Cloudflare described that document on page three of its opposition brief.

3. Given Plaintiffs' designation, Cloudflare filed a redacted version of its opposition brief (Dkt. 4) and temporarily filed under seal an unredacted version of its brief and a copy of Exhibit 6 (Dkt. 5). Cloudflare submits the following index in accordance with Local Civil Rule 5.3(c)(3):

Material	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available
Defendant Cloudflare, Inc.'s Opposition to American Bridal and Prom Industry Association, Inc.'s Motion to Quash Subpoenas at page 3, first paragraph (Dkt. 4 (redacted) and 5 (unredacted))	Cloudflare filed the information under seal in light of Plaintiffs' designation of the information as "CONFIDENTIAL" under the Protective Order entered by the Court in the underlying case.	Cloudflare is unaware of any clearly defined and serious injury that would result if the information is not sealed.	Cloudflare seeks to seal a limited portion of its opposition brief—one sentence on page 3 that describes the document.
Exhibit 6 to the Declaration of Sapna Mehta in Support of Opposition to American Bridal and Prom Industry Association, Inc.'s Motion to Quash Subpoenas (Dkt. 4-7 and Dkt. 5-1)	Cloudflare filed the information under seal in light of Plaintiffs' designation of the information as "CONFIDENTIAL" under the Protective Order entered by the Court in the underlying case.	Cloudflare is unaware of any clearly defined and serious injury that would result if the information is not sealed.	Cloudflare lacks knowledge as to what portion of the document submitted as Exhibit 6 Plaintiffs claim is confidential and thus filed the document under seal in its entirety.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the
30th day of April, 2021.

By: Sapna Mehta
Sapna Mehta

CERTIFICATE OF SERVICE

I hereby certify that on April 30, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ *Silvia M. Medina*
Silvia M. Medina